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March 14, 2017

VIA ECF

Hon. Pamela K. Chen
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Hamoudeh v. UnitedHealth Group Incorporated, No. 16-cv-00790-PKC-RML

Dear Judge Chen:

This firm represents the defendant, UnitedHealth Group Incorporated ("UnitedHealth"), in the above matter. We write on behalf of all parties to inform the Court of the status of the arbitrations in connection with the Court's February 28, 2017 Order.

I. BRIEF HISTORY OF THE LITIGATION

This is a wage-and-hour case. The plaintiffs are twenty-one current and former employees of a UnitedHealth subsidiary. The plaintiffs filed the Complaint on February 16, 2015 (ECF No. 1), and an Amended Complaint on March 24, 2016 (ECF No. 16). After a pre-motion conference, UnitedHealth filed a motion to compel arbitration. While this motion was pending, the plaintiffs agreed to submit their claims to individual arbitration and stay this action. The parties also agreed to withdraw all pending motions. On July 7, 2016, the parties moved to stay this case pending arbitration. (ECF No. 25.) The Court granted this motion the next day.

II. STATUS OF THE ARBITRATIONS

All twenty-one plaintiffs filed individual arbitrations against UnitedHealth. All twenty-one arbitrations are being administrated by the American Arbitration Association and are currently pending. Arbitrators have been selected in twenty of the cases. The parties expect that the AAA will appoint an arbitrator in the one remaining matter, Pratibha Sharma, shortly. The parties have had initial conferences with the arbitrators in several matters, and more calls are scheduled after the date of this letter. Approximately seven cases have been scheduled for hearing thus far. The earliest hearing date is in December 2017, with hearings in the other cases scheduled for January

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and February 2018. The parties anticipate that the remaining matters will be scheduled for hearing in or about February 2018 to in or about May 2018.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John DiNapoli

John DiNapoli

cc: Justin Swartz, Esq.
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